AKZO

Salt Division

18 January 1992

Dermott Courtney
Underground Injection Control Section
USEPA, Region II
Jacob K. Javits Federal Building
New York, NY 10278-0012

Ref: Your letter of 5 January 1993

Dear Mr. Courtney:

The following items are provided in answer to your questions on our plans to use No. 2 fuel oil to control leaching of the recently completed Well No. 58 at our Watkins Glen, NY salt refinery.

- A plat is enclosed showing the location of Well 58. The well is approximately 2280 feet west of Seneca Lake and approximately 125 feet north of the nearest intermittent stream.

- The wellhead will be added to the monuments that are included in the Subsidence Plan submitted to your office on 11 December 1985 and subsequently made an attachment to Permit NYU 63860 on 26 February 1986. This will be accomplished at the next subsidence survey, scheduled for early spring 1993.

- A Spill Prevention, Control, and Countermeasure Plan (SPCC) is currently being generated for the facility by an outside consultant. It shall be supplied to your office upon completion. This shall address the monitoring of the fuel oil, provisions for oil discovery, and control and cleanup procedures.

Akzo Salt Inc.
Abington
Executive Park
P O Box 352
Clarks Summit,
Pennsylvania
18411-0352
Phone:
717/587-5131
Fax:
717/586-0509

- Like any food grade producer, protection of the quality of our product is central to our business. A doubly redundant system is now in place which will absolutely prevent introduction of oil into the evaporator pans. Firstly, all brine produced in the field is fed to an open brine pond, where any oil that is accidently produced with the brine will separate and can be skimmed off the surface. The discharge of this pond is near the bottom, so that oil floating on the top will not be entrained. In the remote event that a leak occurs which allows oil to enter the brine production stream and the brinefield operators fail to notice the oil on the pond and the pond level is allowed to dip to the level of the discharge, some oil will enter the raw brine feed tanks. Here it will again separate and rise to the top of the tank, where it can be drawn off. Experience at our plants in Ohio and Michigan, where redundant brine ponds are not in place, has shown that normal operational procedures effectively prevent any oil from entering the evaporators. Although minor leaks and mixing of oil and brine due to operator error have occurred, no oil has ever entered the evaporators or contaminated any product.

- The purpose of using an oil blanket is to control salt dissolution and cavern growth. The oil placement schedule, volume of oil maintained, oil/brine interface depth, and water injection schedule must all be adjusted as the cavern develops. The figure of 30,000 gallons was chosen not as a constant or normal oil inventory, but as a maximum. We presently plan to use a smaller volume during the first year of operation, but have applied for a greater amount in order to allow us the flexibility to respond to the actual down hole conditions that will be encountered. The geology of the salt beds at Watkins Glen is far from simple, which leads to some unpredictability in leaching. For instance, a fairly moderate roof fall may cause an oil trap to form, requiring additional oil to be used in order to maintain an effective pad over the entire roof. We will also sometimes have occasion to remove oil in order to prevent excessive lateral growth and to allow dissolution of the upper salt beds.

- Roof falls are capable of breaking the suspended tubing strings and allowing a large volume of pad oil to be produced through the brine return piping in a matter of hours. Sufficient freeboard is maintained on the brine pond at all times to contain far more than the maximum 30,000 gallon oil inventory.

If you require further information, please contact me at 717/577-9353.

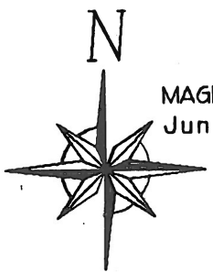
Sincerely,

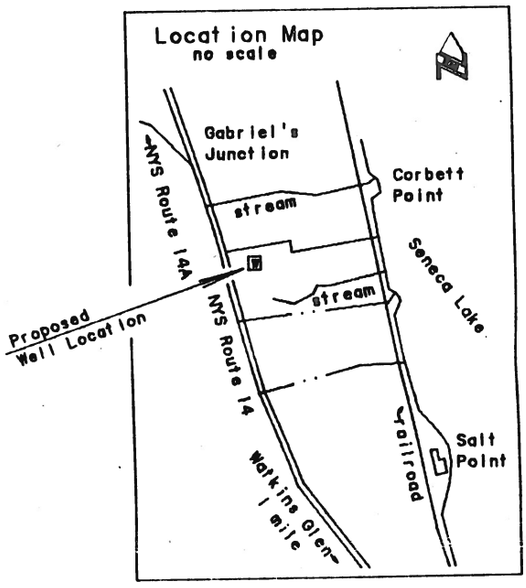
Michael J. Schumacher
Brinefield Project Manager

MJS/jea
Attachment

cc: J.A.C. Atkins
J. A. Loose
G. D. Petrick

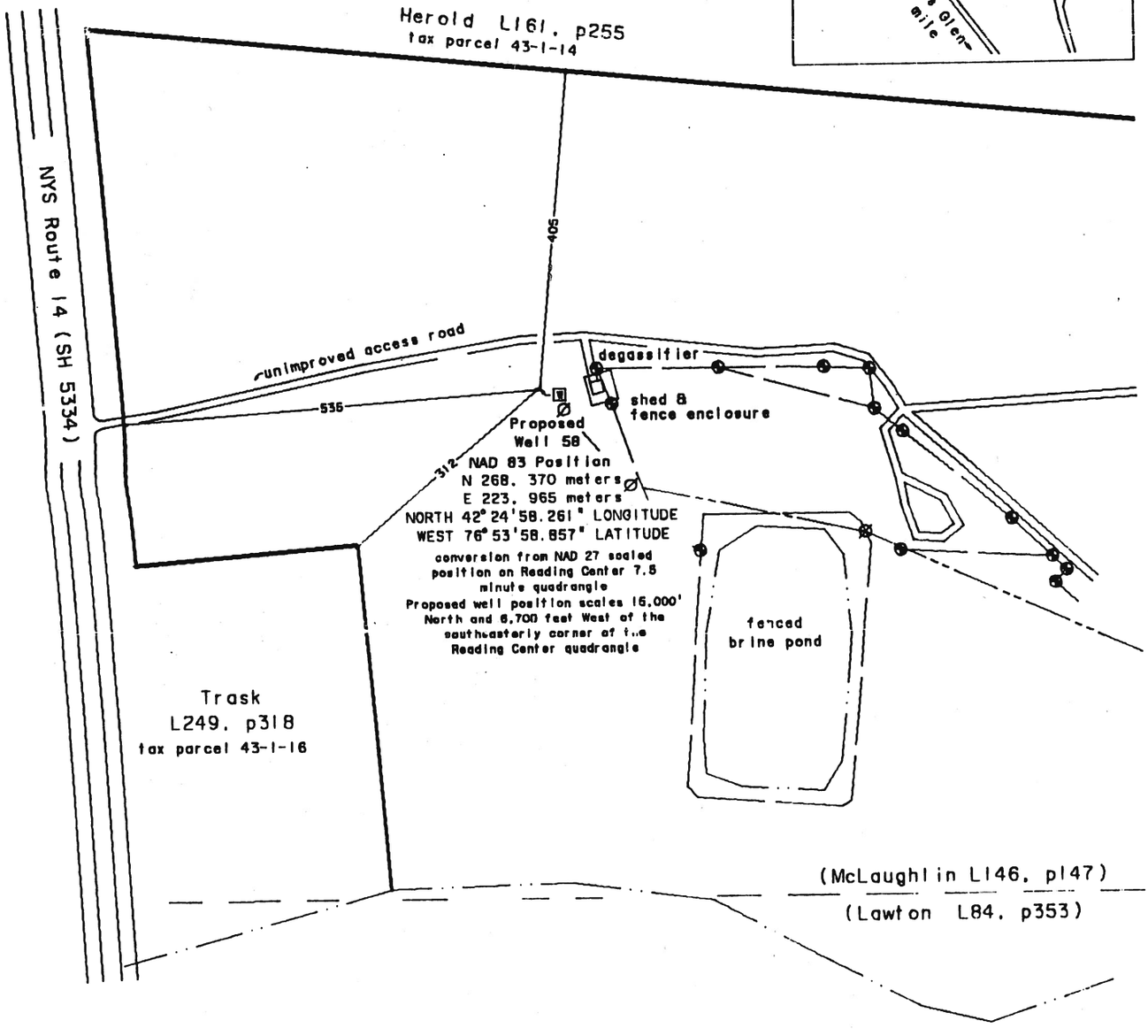
DCOURTII

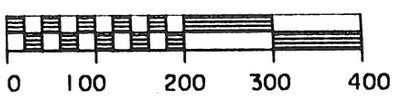




Legend

- Proposed Salt Well 58
- utility pole/overhead wire
- creek
- brine lines (may note location of multiple lines)
- deed line (reference deed to AKZO chain of title)





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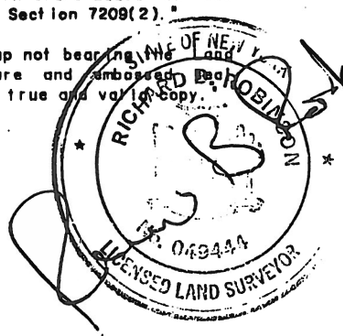
"Any copy of this survey map not bearing the Land Surveyor's original signature and embossed seal shall NOT be considered a true and valid copy."



Map for proposed

AKZO SALT INC.
WELL NO. 58

Scale		Drawn by
1" = 200'		DOS
Date		Tax Map No.
August 17, 1992		located in 43-1-15

located in Lot 4
of James Watson's Purchase
Town of Reading, Schuyler Co., NYS

Page No. 36:249 | Project No. 92138ML

This map prepared by
Robinson Surveying & Mapping
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